

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FATIMA MOUJTAHID, on behalf of
herself and her minor child B.M.,
Plaintiffs,

v.

UNITED STATES CITIZENSHIP &
IMMIGRATION SERVICES, *et al.*,
Defendants.

CASE NO. C18-01789-RSM

**JOINT STATUS REPORT AND
ORDER**

As the Court is aware, Plaintiffs filed the above-captioned lawsuit under the Freedom of Information Act (“FOIA”) against Defendants seeking disclosure of certain documents. On March 5, 2019, the Court granted the parties’ stipulated motion for relief from initial disclosures and the requirements of Federal Rule of Civil Procedure 26(f), instead allowing the parties to file a joint status report on or before April 29, 2019. Dkt. No. 23.

For good cause stated below, the parties respectfully request that the Court allow the parties to continue to work towards resolution of this matter without further judicial intervention and submit a joint status report within the next 60 days.

The parties continue to work cooperatively in an attempt to resolve this litigation without motion practice. Defendants are searching for responsive documents. As the

1 document requests seek records that contain personal information of third parties, these
2 documents will need careful processing for privacy protection. The parties are now in
3 discussions concerning the timing of document production. Additionally, the parties are
4 working on resolving and narrowing issues, so that if judicial intervention is necessary, it
5 will be required on a very limited basis.

6 If at any time in the next 60 days it becomes apparent that resolution between the
7 parties is not feasible, the parties will submit a briefing schedule to the Court.

8 The parties propose a joint status report to be filed on or before June 28, 2019.

9 DATED this 25th day of April, 2019.

10
11 Respectfully Submitted,

12 BRIAN T. MORAN
13 United States Attorney

14 s/ Michelle R. Lambert
15 MICHELLE R. LAMBERT, NYS #4666657
16 Assistant United States Attorney
17 United States Attorney's Office
18 1201 Pacific Ave, Suite 700
19 Tacoma, Washington 98402
20 Phone: (253) 428-3824
21 Email: michelle.lambert@usdoj.gov

22 *Attorneys for Defendants*

23 s/ Jay Gairson
24 JAY GAIRSON, WSBA # 43365
25 Gairson Law, LLC
26 4606 MLK Jr Wy S
27 Seattle, WA 98108
28 Phone: 206-357-4218
Email: jay@gairson.com

Attorney for Plaintiffs

1 **ORDER**

2 It is hereby ORDERED that:

3 For good cause shown, the parties shall file a joint status report on or before June
4 28, 2019.

5
6 Dated this 29 day of April, 2019.

7
8 

9
10 RICARDO S. MARTINEZ
11 CHIEF UNITED STATES DISTRICT JUDGE
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28